



SAMIDH GUHA
212-399-8350 PHONE
sguha@perryguha.com EMAIL

January 26, 2021

VIA ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
40 Foley Square, Room 1305
New York, New York 10007

Re: ***United States v. Martinez***
11 Cr. 1032 (PAE)

Dear Judge Engelmayer:

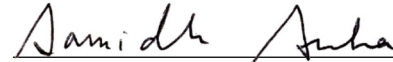
We write with respect to our appointment by Your Honor to serve as counsel pursuant to the Criminal Justice Act (“CJA”) for Juan Martinez in connection with the above-captioned matter and specifically Mr. Martinez’s motion for compassionate release. Due to an error on our part, we did not file a submission on behalf of Mr. Martinez by January 22, 2021 as the Court requested in its order dated December 18, 2020. We apologize profusely and respectfully write to request an extension of the schedule to enable us to do so. This is the first request for an extension in this matter.

We had been in contact with Your Honor’s chambers and agreed to accept this representation on or about December 17, 2020. We did not, however, check the docket afterwards, and instead mistakenly waited for an ECF notification. We therefore missed the order that Your Honor entered appointing us. In updating our CJA account today, we saw the order for the first time, realizing both our error and the schedule that the Court had set.

We would respectfully request permission to file a submission on Mr. Martinez’ behalf in 45 days or such time that Your Honor deems appropriate. Normally we would offer to do so more quickly, but we must reach out to Mr. Martinez and confer with him to make a full and complete submission. Given the logistical challenges that we have experienced in communicating with prisoners in these times, we anticipate that it may take longer than under normal circumstances. We have spoken with the government who has no objection to this proposed extension.

Thank you for Your Honor's consideration of this request and we apologize for our oversight.

Respectfully submitted,



Samidh Guha

cc: AUSA Matthew S. Laroche

GRANTED. Counsel's submission is due March 12, 2021.
The Clerk of Court is requested to terminate the motion at
Dkt. No. 2578.

1/27/2021

SO ORDERED.


PAUL A. ENGELMAYER
United States District Judge